

DAVID M. ROSENBERG-WOHL (S.B.
#132924)
david@hrw-law.com
Hershenson Rosenberg-Wohl,
A Professional Corporation
3080 Washington St.
San Francisco, CA 94115
Telephone: (415) 317-7756

Attorney for Plaintiff

MATTHEW R. COWAN (S.B. #281114)
mcowan@omm.com
O'MELVENY & MYERS LLP
400 South Hope Street, 19th Floor
Los Angeles, California 90071-2899
Telephone: (213) 430-6000
Facsimile: (213) 430-6407

MEAGHAN VERGOW*
mvergow@omm.com
O'MELVENY & MYERS LLP
1625 Eye Street, NW
Washington, DC 20006
Telephone: (202) 383-5300
Facsimile: (202) 383-5414

ANTON METLITSKY*
ametlitsky@omm.com
JENNIFER SOKOLER*
jsokoler@omm.com
O'MELVENY & MYERS LLP
1301 Avenue of the Americas, Suite 1700
New York, NY 10019
Telephone: (212) 326-2000
Facsimile: (212) 326-2061

Attorneys for Defendants
**Admitted pro hac vice*

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JONATHAN GROVEMAN,

Plaintiff,

v.

REGENTS OF THE UNIVERSITY OF
CALIFORNIA, MICHAEL V. DRAKE,
GARY S. MAY, MARY CROUGHAN,
RENETTA GARRISON TULL, CLARE
SHINNERL, PABLO REGUERIN, AND
DOES 1-10,

Defendants.

Case No. 2:24-cv-01421-DJC-AC

**DEFENDANTS' NOTICE OF
REQUEST TO REDACT LIMITED
PORTIONS OF EXHIBIT IN SUPPORT
OF DEFENDANTS' MOTION TO
DISMISS; ORDER**

Assigned to Hon. Daniel J. Calabretta
Courtroom 10

1 Pursuant to Local Rule 140 and this Court's Standing Order in Civil Cases,
2 Defendants The Regents of the University of California, Michael V. Drake, Gary S. May,
3 Mary Croughan, Renetta Garrison Tull, Clare Shinnerl, and Pablo Reguerin
4 ("Defendants") respectfully request leave to redact personally identifiable information in a
5 single exhibit in support of Defendants' anticipated motion to dismiss the first amended
6 complaint. Plaintiff consents to this request and has approved of the proposed
7 redactions.

8 Per this Court's most recent order regarding the briefing schedule, the deadline
9 for Defendants to respond to the amended complaint is October 17, 2024. (ECF No.
10 29.) Defendants anticipate filing a motion to dismiss, accompanied by several
11 supporting exhibits comprising documents incorporated into the complaint. One
12 supporting exhibit consists of an email Plaintiff sent to officials at the University of
13 California, Davis with an attachment of a report that Plaintiff filed with the U.S.
14 Department of Justice. The report contains Plaintiff's home address and phone number.
15 Defendants seek permission to redact that sensitive personal information in its filing
16 before this Court. A copy of the exhibit with the proposed redactions is attached hereto
17 as Exhibit A.

18 Pursuant to Local Rule 140 and this Court's Standing Order in Civil Cases, prior
19 approval of the Court is required in order to redact this information. Redaction is
20 warranted here "[i]n light of legitimate privacy concerns." *Brown v. Elk Grove Unified*
21 *Sch. Dist.*, No. 2:17-CV-00396-KJM-DB, 2019 WL 13095063, at *1 (E.D. Cal. Sept. 19,
22 2019) (granting request to redact telephone numbers and home addresses); *see also*,
23 *e.g.*, *Kamakana v. City & Cty. of Honolulu*, 447 F.3d 1172, 1184 (9th Cir. 2006) (affirming
24 order permitting redaction of home addresses); *Kemper Indep. Ins. Co. v. Wells*, No.
25 117CV01612AWISAB, 2018 WL 558791, at *1 (E.D. Cal. Jan. 25, 2018) (authorizing
26 redaction of defendants' home addresses); *Pryor v. City of Clearlake*, No. C 11-0954
27 CW, 2012 WL 3276992, at *3 (N.D. Cal. Aug. 9, 2012) (authorizing redaction of
28

1 information including addresses and telephone numbers). “[T]he public’s interest in
2 access to documents,” *Kemper*, 2018 WL 558791, at *1, will be safeguarded because
3 the vast majority of the document will remain publicly accessible, and the minimal
4 information proposed to be redacted has no bearing on the issues in the case or
5 arguments raised in the motion to dismiss. For these reasons, Defendants respectfully
6 request that this Court authorize the limited redactions sought by Defendants and
7 consented to by Plaintiff.

8
9 Dated: October 15, 2024.

By: /s/ Matthew R. Cowan
Matthew R. Cowan

Attorney for Defendants

ORDER

This Court, having considered the Request to Redact Limited Portions of Exhibit in Support of Defendants' Motion to Dismiss filed by Defendants The Regents of the University of California, Michael V. Drake, Gary S. May, Mary Croughan, Renetta Garrison Tull, Clare Shinnerl, and Pablo Reguerin ("Defendants"), and compelling reason appearing therefor, hereby ORDERS as follows:

Defendants' Request to Redact Limited Portions of Exhibit in Support of Defendants' Motion to Dismiss is GRANTED. Defendants may file the exhibit with Plaintiff's home address and phone number redacted.

IT IS SO ORDERED.

Dated: October 16, 2024

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE